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April 9, 2012

## VIA FACSIMILE

Honorable Tonianne J. Bongiovanni, U.S.M.J. United States District Court for the District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Room 2020 Trenton, New Jersey 08608 APR - 9 2012

AT 8:30
WILLIAM T. WALSH M
CLERK

Re:

Takeda Pharmaceutical Company Limited, et al. v. Zydus Pharmaceuticals (USA) Inc. et al. Civil Action No. 3:10-CV-01723-JAP-TJB

## Dear Judge Bongiovanni:

We represent defendants Zydus Pharmaceuticals (USA) Inc. and Cadilia Healthcare Limited (collectively "Zydus") in the above-referenced action. We write on behalf of Zydus and plaintiffs Takeda Pharmaceutical Company Limited, Takeda Pharmaceuticals North America, Inc., Takeda Pharmaceuticals LLC, and Takeda Pharmaceuticals America, Inc. (collectively "Takeda") jointly to request an extension of time to file publicly available redacted versions of the documents referenced in Your Honor's Orders (ECF Docket Nos. 166 and 167) (the "Orders") entered on March 20, 2012. Pursuant to the Orders, Your Honor directed Zydus to file redacted versions of the material sealed by way of Zydus' motions filed on March 1, 2012 (ECF Docket No. 153) and March 5, 2012 (ECF Docket No. 155). However, Zydus must confer with Takeda to obtain assistance in redacting the documents at issue and to file publicly available redacted versions of each document.

Accordingly, the parties require additional time to meet-and-confer to properly identify all confidential information contained in the documents at issue and to redact said documents for filing purposes. Accordingly, both parties respectfully request that Your Honor extend the current deadline to file the redacted documents up to and including May 9, 2012.

## KELLEY DRYE & WARREN LLP

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Respectfully submitted,

Vincent P. Rao II

cc: Counsel of Record (via email)

SO ORDERED:

Dated: 4/9/12

Tonianne J. Bongiovanni, U.S.M.J.